

# **EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO,  
S. DE R.L. DE C.V., *et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY  
AND IN HIS CAPACITY AS FOREIGN  
REPRESENTATIVE OF PERFORADORA  
ORO NEGRO, S. DE R.L. DE C.V. AND  
INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE  
C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL  
PARTNERS, LLC; AMA CAPITAL  
PARTNERS, LLC; ANDRES CONSTANTIN  
ANTONIUS-GONZÁLEZ; ASIA RESEARCH  
AND CAPITAL MANAGEMENT LTD.; CQS  
(UK) LLP; FINTECH ADVISORY, INC.;  
DEUTSCHE BANK MÉXICO, S.A.;  
INSTITUCIÓN DE BANCA MÚLTIPLE;  
GARCÍA GONZÁLEZ Y BARRADAS  
ABOGADOS, S.C.; GHL INVESTMENTS  
(EUROPE) LTD.; JOHN FREDRIKSEN;  
KRISTAN BODDEN; MARITIME FINANCE  
COMPANY LTD.; NOEL BLAIR HUNTER  
COCHRANE, JR; ORO NEGRO PRIMUS  
PTE., LTD.; ORO NEGRO LAURUS PTE.,  
LTD.; ORO NEGRO FORTIUS PTE., LTD.;  
ORO NEGRO DECUS PTE., LTD.; ORO  
NEGRO IMPETUS PTE., LTD.; PAUL  
MATISON LEAND, JR.; ROGER ALAN  
BARTLETT; ROGER ARNOLD HANCOCK;  
SEADRILL LIMITED; SHIP FINANCE  
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

BK Case No. 18-11094 (SCC)  
(Jointly Administered) (Chapter 15)

Adversary Case No. 19-01294 (SCC)

**[PROPOSED] ORDER**

Pursuant to Plaintiffs' Unopposed Motion For Extension Of Time To Respond To Motion To Dismiss, and based on this Court's view, in its discretion, that the plaintiffs' request is reasonable under the circumstances; it is hereby ORDERED that Plaintiffs' Unopposed Motion For Extension Of Time To Respond To Motion To Dismiss is hereby GRANTED; and it is further ORDERED that Defendants' response or other responsive pleading shall be due on or before Tuesday, November 12, 2019.

ENTERED this \_\_\_\_ day of \_\_\_\_\_, 2019.

SO ORDERED

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THE HONORABLE SHELLEY C. CHAPMAN  
United States Bankruptcy Judge